

**UNITED STATES DISTRICT COURT  
FOR THE SOUTHERN DISTRICT OF TEXAS  
LAREDO DIVISION**

**IN RE APPLICATION OF THE  
ASSOCIATED PRESS, GANNETT  
CO., INC., GRAY MEDIA GROUP,  
INC., HEARST CORPORATION,  
AND THE TEXAS TRIBUNE TO  
UNSEAL COURT RECORDS**

Misc. Action No. 5:22-mc-00111  
Hon. Andrew M. Edison

**[PROPOSED] ORDER GRANTING MOTION TO UNSEAL SEALED  
RESPONSE OF THE UNITED STATES**

This matter comes before the Court upon the Motion of the Associated Press, Gannett Co., Inc., Gray Media Group, Inc., Hearst Corporation, and the Texas Tribune to unseal the sealed response filed by the United States in this matter. *See* ECF No. 8; ECF No. 7. Upon review and consideration of the Motion and any opposition thereto it is hereby **ORDERED** that:

1. The Motion is **GRANTED**.
2. The response of the United States is **HEREBY UNSEALED**.
3. The Clerk of the Court is hereby directed to make the aforementioned response publicly available.

Dated: September \_\_\_, 2022

\_\_\_\_\_  
Andrew M. Edison  
United States Magistrate Judge

Respectfully submitted,

*s/ Katie Townsend*

---

Katie Townsend  
Attorney-in-Charge  
(S.D. Texas Bar No. 3547279)

[ktownsend@rcfp.org](mailto:ktownsend@rcfp.org)

Grayson Clary\*

[gclary@rcfp.org](mailto:gclary@rcfp.org)

REPORTERS COMMITTEE FOR

FREEDOM OF THE PRESS

1156 15th St. NW, Suite 1020

Washington, DC 20005

Phone: 202.795.9300

Facsimile: 202.795.9310

*\* Admitted pro hac vice*

*Counsel for Applicants The Associated  
Press, Gannett Co., Inc., Gray Media  
Group, Inc., Hearst Corporation, and The  
Texas Tribune*

**CERTIFICATE OF SERVICE**

I, Katie Townsend, hereby certify that on the 12th day of September 2022, a copy of the foregoing was filed electronically using this Court's CM/ECF system

Dated: September 12, 2022

Respectfully submitted,

*s/ Katie Townsend*

Katie Townsend

REPORTERS COMMITTEE FOR  
FREEDOM OF THE PRESS

*Counsel for Applicants The Associated  
Press, Gannett Co., Inc., Gray Media  
Group, Inc., Hearst Corporation, and The  
Texas Tribune*